

(2) ***Restrictions on Fugitive Dust Emissions***  
***OAC rule 3745-17-08(B)(6)***

No person shall cause or permit any fugitive dust source to be operated; or any materials to be handled, transported, or stored; or a building or its appurtenances or a road to be used, constructed, altered, repaired, or demolished without taking or installing reasonably available control measures to prevent fugitive dust from becoming airborne. Such reasonably available control measures shall include, but not be limited to, one or more of the following which are appropriate to minimize or eliminate visible particulate emissions of fugitive dust:

- (6) The periodic application of water or other suitable dust suppression chemicals, the installation of storage silos, bins or other enclosed structures, or the use of canvas or other suitable coverings, for all materials stockpiles and stockpiling operations, except temporary stockpiles and stockpiling operations for grain and grain products

AEC has failed to provide reasonably available control measures that are sufficient to minimize or eliminate visible emissions of coal dust associated with the clean coal storage pile. Although AEC informed Ohio EPA that a dust suppressing chemical is being applied to the coal prior to being loaded onto the pile, it does not appear this chemical is effective in preventing coal dust from blowing off the pile and off AEC property.

To resolve violation #'s 1 and 2 above, AEC must immediately investigate and implement more effective control measures that will prevent wind erosion of coal from the clean coal storage pile as required in Condition A.2.e. in Part II, Special Terms and Conditions for Emissions Unit F002 in PTI # 06-06463, issued on June 7, 2001.

(3) ***Permit Condition II.A.1. of PTI # 06-06463 for Emissions Unit F003 (Unpaved Roadways and Parking Areas)***

Particulate emissions shall not exceed 2.0 tons per year (tpy).

In a letter from AEC dated October 9, 2006, the company reported that it had recalculated actual emissions for emissions unit F003 for 2005, and had documented an exceedance of the allowable particulate emissions of 2.0 tpy in PTI #06-06463 for this unit. Based on significant increases in large vehicle miles traveled (82,000 vs. 3,100), significantly more particulate than the current permitted allowable was emitted in 2005. Assuming there were no changes in the amount of small truck traffic, the actual particulate emissions were at least 26 tpy.

The October 9<sup>th</sup> letter indicated that to resolve the non-compliance, a new PTI application would be submitted to request higher allowable particulate emissions for